

CHRISTENSEN JAMES & MARTIN, CHTD.

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 of the Painters & Floorcoverers Joint Committee, et al.*

UNITED STATES DISTRICT COURT**DISTRICT OF NEVADA**

BOARD OF TRUSTEES OF THE
 PAINTERS AND FLOORCOVERERS
 JOINT COMMITTEE, *et al.*,

Plaintiffs,

vs.

SUPER STRUCTURES INC., a Nevada
 corporation dba SUPER STRUCTURES, *et
 al.*,

Defendants.

CASE NO.: 2:18-cv-01364-GMN-EJY

**JOINT MOTION TO EXTEND
 DEADLINES TO FILE MOTION TO
 RECONSIDER, RESPOND TO
 ATTORNEY'S FEES MOTION, FILE
 STATUS REPORT AND JOINT PRE-
 TRIAL ORDER**

(FIRST REQUEST)

Date: N/A
 Time: N/A

Come Now the Plaintiffs ("Plaintiffs" or "Trusts"), by and through their attorneys, Christensen James & Martin, Chtd. and Defendants, Super Structures Inc., Tracey Reynolds, Robert Reynolds, and Western National Mutual Insurance Company ("Defendants"), by and through their attorneys, Cook & Kelesis, Ltd., pursuant to LR IA 6.1, hereby jointly move and request this Court to extend several deadlines, as follows.

POINTS AND AUTHORITIES

On November 30, 2020, this Court entered its Order [ECF No. 62] granting Plaintiffs' Motion for Summary Judgment against Defendants Super Structures, denying Defendants' Motion for Summary Judgment, denying as moot Plaintiffs' Motion to Strike, and denying as moot Defendants' Motion for Leave to File Excess Pages ("Summary Judgment Order"). The Summary Judgment Order set deadlines for the filing of a Status Report and Joint Pretrial Order.

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On December 14, 2020, Plaintiffs filed a Motion for Award of Attorney's Fees and Costs Against Judgment Debtors Super Structures, Inc. and Super Structures Inc. [ECF No. 63] ("Attorney's Fees Motion") based on this Court's Summary Judgment Order. Defendants intend to file a Motion to Reconsider this Court's Summary Judgment Order, which Defendants believe is due on December 28, 2020.

The Parties request that this Court extend the deadlines for three (3) weeks on the briefing of the Attorney's Fees Motion and the Motion to Reconsider this Court's Order (not yet filed) and for the filing of the Status Report and Joint Pretrial Order. Good cause exists to extend the time because the Plaintiffs' and Defendants' attorneys have both scheduled time off at the end of this year. The requested extension will provide the Parties with more opportunity to prepare and submit their pleadings. This is the first stipulation to extend the time by which the Parties must file or answer the respective pleadings.

This will affect the schedule, as follows:

<u>Event</u>	<u>Current Deadline</u>	<u>Proposed Deadline</u>
Motion to Reconsider	December 28, 2020	January 18, 2021
Opposition to Motion to Reconsider	January 11, 2021	February 1, 2021
Reply to Opposition to Motion to Reconsider	January 18, 2021	February 8, 2021
Opposition to Attorney's Fees Motion	December 28, 2020	January 18, 2021
Reply to Opposition to Attorney's Fees Motion	January 4, 2021	January 25, 2021
Status Report	December 21, 2021	January 11, 2021
Joint Pretrial Order	December 30, 2021	January 20, 2021

This request for an extension of time is not sought for any improper purpose or other purpose of delay.

The Parties respectfully submit that the reasons set forth above constitute good cause for the discovery extension and deadlines requested above.

1 **IT IS SO STIPULATED.**

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3 Dated this 18th day of December 2020.

4 CHRISTENSEN JAMES & MARTIN

COOK & KELESIS, LTD.

5
6 By: /s/ Wesley J. Smith

By: /s/ Marc P. Cook

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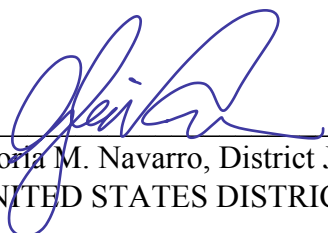
Las Vegas, NV 89101

9 Attorneys for Plaintiffs

Attorneys for Defendants

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12 **IT IS SO ORDERED:**

13 Dated this 22 day of December, 2020.

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Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT

18 SUBMITTED BY:

19 CHRISTENSEN JAMES & MARTIN

20 By: /s/ Wesley J. Smith

Wesley J. Smith, Esq.

21 Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I am an employee of Christensen James & Martin. On the date of filing of the foregoing papers with the Clerk of Court, I caused a true and correct copy to be served in the following manner:

☒ ELECTRONIC SERVICE: Pursuant to Local Rule LR IC 4-1 of the United States District Court for the District of Nevada, the above-referenced document was electronically filed and served on all appearing parties through the Notice of Electronic Filing automatically generated by the Court.

☐ UNITED STATES MAIL: By depositing a true and correct copy of the above-referenced document into the United States Mail with prepaid first-class postage, addressed to the parties at their last-known mailing address(es):

☐ ELECTRONIC MAIL: By sending the above-referenced document via electronic mail to those persons and those addresses listed below:

CHRISTENSEN JAMES & MARTIN

By: /s/ Natalie Saville